

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re: Equifax, Inc. Customer  
Data Security Breach Litigation

MDL Docket No. 2800  
No. 1:17-md-2800-TWT

This document relates to:

*City of Chicago v. Equifax Inc.*,  
No. 1:18-cv-1470

**JOINT MOTION TO EXTEND DEADLINES**

Pursuant to Federal Rule of Civil Procedure 6(b) and Section 3 of Case Management Order No. 5 (“CMO-5,” MDL Dkt. 409), Plaintiff City of Chicago (“Chicago”) and Defendant Equifax Inc. (“Equifax,” and collectively, the “Parties”) respectfully request that the Court extend all deadlines with respect to Chicago’s filing of an amended complaint and briefing on Equifax’s motion to dismiss the amended complaint by an additional twenty-one (21) days. In support of the instant motion, the parties state as follows:

1. On January 23, 2020, the Court granted the parties’ Joint Motion to Set Deadlines, setting the following schedule: Chicago’s deadline to file an amended complaint as February 19, 2020; Equifax’s deadline to file a motion to dismiss the amended complaint as March 20, 2020; Chicago’s deadline to respond to the motion to dismiss as April 10, 2020; and Equifax’s deadline to reply in support of its motion

to dismiss as April 24, 2020. (*See* MDL Dkt. 968.)

2. Following the entry of that schedule, the Parties informed the Court that they had reached an agreement in principle to settle the City's lawsuit and were in the process of drafting a formal settlement agreement. Given that, the Parties jointly requested a twenty-eight (28) day extension of all deadlines, which the Court subsequently granted. (MDL Dkts. 967, 997, respectively.)

3. Although the Parties are diligently working to finalize their agreement, a brief extension of time is needed to complete the drafting of and execute the Parties' agreement.

4. Accordingly, the parties jointly request a twenty-one (21) day extension of all deadlines set forth in the Court's February 19, 2020 Order (MDL Dkt. 997), so that they may finalize their agreement and resolve all of the City's claims in this case.

WHEREFORE, the parties respectfully request that the Court enter an order setting forth the jointly proposed schedule outlined above. A proposed order is attached for the Court's consideration.

Respectfully submitted,

**CITY OF CHICAGO,**

Dated: March 17, 2020

/s/ Eve-Lynn J. Rapp  
One of Plaintiff's Attorneys

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Dated: March 17, 2020

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**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 5.1(B)**

Pursuant to Local Rule 7.1(D), I hereby certify that that above and foregoing *Joint Motion to Extend Deadlines* complies with Local Rule 5.1(B) and has been prepared using 14-point Times New Roman font.

/s/ Eve-Lynn J. Rapp

**CERTIFICATE OF SERVICE**

I certify that on March 17, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of Georgia using the Court's CM/ECF system, which will automatically send notification of this filing to all counsel of record.

/s/ Eve-Lynn J. Rapp